

RAFEY S. BALABANIAN (Admitted *Pro Hac Vice*)
rbalabanian@edelson.com
BENJAMIN H. RICHMAN (Admitted *Pro Hac Vice*)
brichman@edelson.com
CHRISTOPHER L. DORE (Admitted *Pro Hac Vice*)
cdore@edelson.com
EDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Telephone: (312) 589-6370

SEAN P. REIS (SBN 184044)
sreis@edelson.com
30021 Tomas Street, Suite 300
Rancho Santa Margarita, California 92688
Telephone: (949) 459-2124

Counsel for Plaintiff and the putative class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DAVID TRINDADE, individually and on behalf of all others similarly situated,

Plaintiff,

1

REACH MEDIA GROUP, LLC, a Delaware limited liability company,

Defendant.

Case No. 5:12-cv-04759 (PSG)

**PLAINTIFF'S REQUEST TO APPEAR
TELEPHONICALLY AT STATUS
CONFERENCE**

Judge: Honorable Paul Singh Grewal
Date: December 17, 2013
Time: 10:00 a.m.
Action Filed: September 12, 2012

1 TO: All parties and their counsel of record.

2 **PLEASE TAKE NOTICE** that Benjamin H. Richman, counsel for Plaintiff David
 3 Trindade, hereby respectfully requests leave of the Court to appear telephonically at the status
 4 conference scheduled in this matter for Tuesday, December 17, 2013, at 10:00 a.m. Because
 5 Defendant Reach Media Group, LLC is no longer represented by counsel, has not been in
 6 communication with Plaintiff's counsel, and has not otherwise shown an intention to continue to
 7 defend the instant action, Plaintiff anticipates the filing of a motion for default judgment and thus,
 8 makes the instant request in good faith to avoid the additional expenditure of time and other
 9 resources necessary to travel from Chicago, Illinois to San Jose, California. In the event that the
 10 Court grants the instant request, Plaintiff's counsel will make all necessary arrangements to appear
 11 telephonically via the California CourtCall service. Of course, if the Court prefers that Plaintiff's
 12 counsel appear in person, counsel will make the necessary arrangements to do so.

13 Respectfully submitted,

14 **DAVID TRINDADE**, individually and on behalf of
 15 all others similarly situated,

16 Dated: December 13, 2013

By: /s/ Benjamin H. Richman
 One of Plaintiff's Attorneys

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